

RKW, LLC

Stacey Torres (293522020)
H. Mark Stichel (pro hac vice)
10075 Red Run Blvd, Ste 401
Owings Mills, Maryland 21117
(443) 379-8941
storres@rkwlawgroup.com
hmstichel@rkwlawgroup.com

*Attorneys for Defendant
eMerges.com Inc.*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY
CORPORATION, et al.,

Plaintiffs,

v.

E-MERGES.COM INC., et al.,

Defendants.

*

*

*

*

*

Civil Action No.: 1:24-cv-04434-HB

MOTION TO DISMISS

* * * * *

eMerges.com. Inc. (“eMerges.com”), by its attorneys, moves pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure that the Court dismiss with prejudice the Plaintiffs’ Complaint on the grounds that the Court lacks personal jurisdiction over eMerges.com and that the Complaint fails to state a claim upon which relief can be granted.

The grounds in support of this Motion are stated in the Memorandum and Declaration of Shawn J. Harmon accompanying this Motion.

Respectfully submitted,

RKW, LLC

By: /s/ H. Mark Stichel
H. Mark Stichel*
Stacey Torres (293522020)
10075 Red Run Blvd, Ste 401
Owings Mills, Maryland 21117
(443) 379-8941
storres@rkwlawgroup.com
hmstichel@rkwlawgroup.com

** Admitted pro hac vice*

*Attorneys for Defendant
eMerges.com Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March 2025, a copy of the foregoing Motion to Dismiss, Memorandum and Declaration were sent via the courts electronic filing system to all counsel of record.

By: /s/ H. Mark Stichel
H. Mark Stichel*
Stacey Torres (293522020)